

DISTRICT OF NEW JERSEY  
UNITED STATES BANKRUPTCY COURT

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

Janelly Landa, Esq. (ID #168652016)  
SCHILLER, KNAPP,  
LEFKOWITZ & HERTZEL, LLP  
A LLP Formed in the State of New York  
30 Montgomery Street, Suite 1205  
Jersey City, New Jersey 07302  
(518) 786-9069  
Attorneys for Creditor, TD Auto Finance LLC

In Re:

SHARON K. EDDY,  
  
Debtor.

Case No.: 18-19684-JNP

Hearing Date: February 25, 2020

Judge: Hon. Jerrold N. Poslusny

Chapter: 13

**NOTICE OF CREDITOR'S MOTION FOR RELIEF FROM  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(d)(1)  
HEARING DATE AND TIME:  
February 25, 2020, 10:00 AM**

**ORAL ARGUMENT IS REQUESTED IN THE EVENT  
OPPOSITION IS TIMELY FILED**

TO:

Sharon K. Eddy (Debtor)  
811 Woodchuck Drive  
Mount Laurel, New Jersey 08054

Brad J. Sadek, Esq.  
Attorney for Debtor  
Sadek and Cooper  
1315 Walnut Street, Suite 502  
Philadelphia, Pennsylvania 19107  
19107

Isabel Balboa, Esq. (Trustee)  
Cherry Tree Corporate Center  
535 Route 38, Suite 580  
Cherry Hill, New Jersey 08002

United States Trustee  
One Newark Center  
Suite 2100  
Newark, New Jersey 07102

PLEASE TAKE NOTICE that on February 25, 2020, at 10:00 AM, or as soon thereafter as counsel may be heard, Schiller, Knapp, Lefkowitz & Hertz, LLP, attorneys for TD Auto Finance LLC , the within creditor ("Creditor"), shall move before the Honorable Jerrold N. Poslusny, United States Bankruptcy Judge, at United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, Courtroom 4C, 400 Cooper Street, 4th Floor, Camden, New Jersey 08101, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, in the alternative, directing the Debtor, above-named, to immediately provide for the adequate protection of any property subject to the interests of such Creditor; for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification of Janelly Landa, Esq. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the Clerk, United States Bankruptcy Court, United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, New Jersey 08101 and simultaneously served on Creditor's counsel, Schiller, Knapp, Lefkowitz & Hertz, LLP, 30 Montgomery Street, Suite 1205, Jersey City, New Jersey 07302 (Attention: Janelly Landa, Esq.) so as to be received no later than seven (7) days before the return date set forth herein.

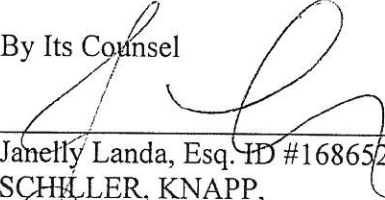
PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: January 30, 2020

TD AUTO FINANCE LLC

By Its Counsel



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